

IN THE UNITED STATE DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

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PROGRESSIVE PREFERRED  
INSURANCE COMPANY

Plaintiff

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

vs.

CASE NO. 3:06-CV-00934

JMP ENTERPRISES, INC.;  
JOHN MARK PARKER; and  
JENNIFER M. GOLDEN

Defendants

**MOTION FOR SUMMARY JUDGMENT BY JENNIFER GOLDEN**

Comes now Jennifer Golden, one of the defendants, and moves the court to enter a summary judgment holding that Progressive's policy of insurance, together with the endorsements to such policy, provide coverage for the allegations of Jennifer Golden's First Amended Complaint in the Circuit Court of Lee County, Alabama, Case No. 2006-106. As grounds for this motion, Golden alleges that no genuine dispute exists in the materials facts concerning coverage, and she is entitled to judgment as a matter of law.

More particularly, Golden alleges that she is entitled to judgment as a matter of law for the reasons stated in her brief filed herewith which is entitled "Golden's Brief in Opposition to Progressive's Motion for Summary Judgment and in Support of Her Motion for Summary Judgment." Golden's "Statement of Undisputed Facts" is contained in such brief.

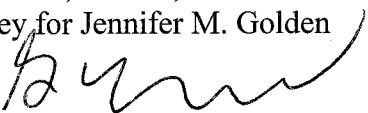
This motion is based on the pleadings and Golden's evidentiary submission entitled "Golden's Evidentiary Submission in Opposition to Progressive's Motion for Summary Judgment

and in Support of Her Motion for Summary Judgment." Such evidentiary submission is also filed simultaneously with this motion.

**HOWARD, DUNN, HOWARD & HOWARD**

Attorney for Jennifer M. Golden

By:

  
G. Houston Howard II

Of Counsel:

**G. Houston Howard II (HOW015)**

Howard, Dunn, Howard & Howard  
P.O. Box 1148  
Wetumpka, Alabama 36092  
Telephone: 334-567-4356  
Facsimile: 334-567-7080

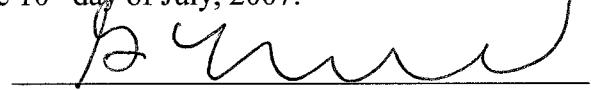
**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing on:

**R. Larry Bradford  
Bradford & Sears, P.C.  
2020 Canyon Road, Suite 100  
Birmingham, AL 35216**

**John Mark Parker  
P. O. Box 3501  
LaGrange, GA 30242**

counsel of record, by placing the same in the U.S. Mail, postage prepaid and properly addressed, on this the 10<sup>th</sup> day of July, 2007.

  
Of Counsel

*Doc:Houston\Golden.Jennifer\Progressive\Motion.SummaryJudgment*